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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, JULIAN  
SANTIAGO, and SUSAN LYNN  
HARVEY, individually and on behalf of all  
others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

**SUSMAN GODFREY L.L.P.**

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Shawn J. Rabin (admitted pro hac vice)  
Steven M. Shepard (admitted pro hac vice)  
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Case No.: 3:20-cv-04688-RS

**PLAINTIFFS' ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
ANOTHER PARTY'S MATERIALS  
SHOULD BE SEALED**

Judge: Hon. Richard Seeborg

Pursuant to Civil Local Rules 7-11 and 79-5, Plaintiffs respectfully ask the Court to consider whether Google LLC's ("Google") material should be sealed. Although portions of these materials were made public at trial, Plaintiffs' filings contain materials that Google has designated as confidential under the parties' protective order. The material is included within Plaintiffs' Motion for Permanent Injunction and Disgorgement of Profits.

| Document or Portion of Document Sought to be Sealed   | Party Claiming Confidentiality | Portions to be Filed Under Seal | Basis for Sealing   |
|---|--------------------------------|---------------------------------|---|
| Mao Declaration, Exhibit 3 – Google's Supplemental Objections and Responses to Plaintiffs' Interrogatories, Set 6 (Nos. 12, 16, & 17) | Google                         | Entirety                        | Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order |
| Mao Declaration, Exhibit 4 – Excerpts of the Deposition of David Monsees (September 15, 2022)   | Google                         | Entirety                        | Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order |
| Mao Declaration, Exhibit 9 – Excerpts of the Deposition of Michael J. Lasinski (June 29, 2023)  | Google                         | Entirety                        | Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order |
| Mao Declaration, Exhibit 11 – Excerpts of the Deposition of Christopher R. Knittel (July 11, 2023)                                    | Google                         | Entirety                        | Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order |
| Mao Declaration, Exhibit 12 – Second Supplemental Expert Report of Michael J. Lasinski (April 25, 2025)                               | Google                         | Entirety                        | Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order |
| Mao Declaration, Exhibit 13 – Supplemental Rebuttal Expert Report of Christopher R. Knittel (June 19, 2025)                           | Google                         | Entirety                        | Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order |
| Mao Declaration, Exhibit 14 – Google's Second   | Google                         | Entirety                        | Material Designated "Confidential" or "Highly   |

|   |        |          |   |
|---|--------|----------|---|
| Supplemental Objections and Responses to Plaintiffs' Interrogatories, Set 6   |        |          | Confidential – Attorneys' Eyes Only" pursuant to the Protective Order   |
| Mao Declaration, Exhibit 15 – Excerpts of the Deposition of Steve Ganem (October 28, 2022)                                | Google | Entirety | Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order |
| Mao Declaration, Exhibit 16 – Google's Responses and Objections to Plaintiffs' Request for Production of Documents, Set 8 | Google | Entirety | Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order |
| Mao Declaration, Exhibit 17 – Emails Between Counsel Re: Documents that Google Produced                                   | Google | Entirety | Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order |
| Mao Declaration, Exhibit 18 – Document that Google produced with Bates Label GOOG-RDGZ-00067396                           | Google | Entirety | Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order |
| Mao Declaration, Exhibit 20 – Supplemental Expert Report of Michael J. Lasinski (January 3, 2025)                         | Google | Entirety | Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order |

Dated: October 22, 2025

By /s/ Mark C. Mao

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